

# **EXHIBIT 16**

BRANCH

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION

JAMES S. DEW, ET AL., )

Plaintiffs, )

vs. )

E.I. DU PONT DE NEMOURS AND )  
COMPANY, ET AL., )

Defendants. )

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JAMES O'BRIEN, ET AL., )

Plaintiffs, )

vs. )

E.I. DU PONT DE NEMOURS AND )  
COMPANY, ET AL., )

Defendants. )

CASE NO.  
5:18-cv-0073-D

CASE NO.  
5:20-cv-00208-D

VIDEO DEPOSITION

OF

SANDRA BRANCH

November 11, 2022 - 8:33 a.m.

Fayetteville, North Carolina

Job#: 218423

Stenographically

Reported by: Lisa A. Wheeler, RPR, CRR

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A. -- Jackson, Mississippi.

Q. Is Speech Solutions based in Fayetteville?

A. In Lumberton.

Q. What made you stop driving trucks and start working for Speech Solutions?

A. We needed insurance for one thing because we didn't -- we -- he was covered, but basically, I wasn't. I didn't have any health insurance so -- and then the activities out driving and just -- I just wanted to -- to do something different, go back to what I was doing.

Q. How long did you work at Southeastern Speech?

A. I'd say three years before they shut down -- I mean, she sold the company.

Q. Were you working there when she sold the company?

A. Yes.

Q. At Southeastern Speech were you also working as a speech language pathology assistant?

A. Yes.

Q. What is your current residential address?

1 BRANCH

2 A. 37 West Shaw Mill Road, St. Pauls.

3 Q. How long have you lived there?

4 A. I'm thinking -- I think it's, like, 22  
5 years now.

6 Q. Do you rent the home or own it?

7 A. My home --

8 Q. Do --

9 A. -- or my rental property?

10 Q. So we're going to start with where you  
11 live --

12 A. Okay.

13 Q. -- right now and then we'll go to the  
14 rental property.

15 A. Oh, I own it.

16 Q. Who lives at the 37 West Shaw Mill  
17 address with you?

18 A. My husband and my nephew.

19 Q. What's your husband's name?

20 A. Hugh. Hugh Branch.

21 Q. What's your nephew's name?

22 A. Marshawn McMillan.

23 Q. How old is Marshawn?

24 A. 31, I think.

25 Q. What made you move to that 37 West Shaw

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Mill address?

A. Actually, when I was with someone else looking for a house and I ended up buying one and they didn't and then I had to find someplace to put it and that's when I found out that Rufus Johnson was selling that property.

Q. What do you mean when you said you had to find a place to put it?

A. Because I bought -- I didn't go out looking for a house. I went with someone else looking for a house, but I ended up buying one.

Q. Right. But I guess what I'm asking you is, like -- so were you buying a -- a mobile home?

A. Yes.

Q. Do you currently have any other properties other than 37 West Shaw Mill?

A. The 21 West Shaw Mill, which is beside me, and then we have a -- a home in Hope Mills that we are currently selling.

Q. All right. So I just want to make sure that I have this straight. So you have one piece of property and both 37 West Shaw Mill and 21 West Shaw Mill are on that property?

1 BRANCH

2 A. Yeah. They're right -- right beside  
3 each other.

4 Q. Is it one lot?

5 A. No, separate.

6 Q. Sep- -- so it's two lots?

7 A. Yes. But it's -- yes.

8 Q. But two lots right beside each other?

9 A. Uh-huh.

10 Q. Are you claiming that both of them have  
11 been damaged by this lawsuit?

12 A. Yes.

13 Q. I'm going to show you what's going to  
14 be marked as Exhibit 1. It's called your  
15 Plaintiff's Fact Sheet.

16 MS. GIESER: Let's go off the record  
17 for just a second.

18 THE VIDEOGRAPHER: Off the record at  
19 9:03.

20 (Discussion off the record.)

21 (BRANCH EXHIBIT 1, Plaintiff Fact  
22 Sheet, was marked for identification.)

23 THE VIDEOGRAPHER: Back on the record  
24 at 9:04.

25 BY MS. GIESER:

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Q. Are you claiming that any other properties you own have been affected by Du Pont or Chemours?

A. Yes.

Q. Which ones?

A. The 37 West Shaw Mill Road and 21 West Shaw Mill Road.

Q. Where did you live prior to living at 37 West Shaw Mill Road?

A. 260 Boones Trail, Chicken Foot Road.

Q. What city is that in?

A. In St. Pauls.

Q. About when did you live there?

A. Prior to 1998. I had lived on -- I lived there my entire life until I moved to 21 -- I mean, 37 West Shaw Mill Road.

Q. Did you own that home at Boones Trail?

A. I did.

Q. What caused you to move from Boones Trail to West Shaw -- 37 West Shaw Mill?

A. Like I said, I bought a house that I hadn't intended on buying but -- and my mother had died so I, you know, just wanted a change.

Q. Have you ever lived at 21 West Shaw

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distance, really, in between -- you know, wide, I mean.

Q. And when you say 25, you mean 25 feet?

A. May not even be that much; it's just that close.

Q. How close is the neighbor on the other side to 37 West Shaw Mill?

A. About the same distance. A little more -- they're the little -- they're a little more because their house is smaller. So, I guess, 20- -- from one end of my house to end of their house would be -- I'm not really sure.

Q. Are there any bodies of water on your property like ponds, lakes, or streams?

A. No.

Q. What year did you purchase 37 West Shaw Mill Road?

A. 1998, I think it was.

Q. Does anyone co-own it with you?

A. No.

Q. Am I correct that you purchased the mobile home first and the land second?

A. I did.

Q. Who did you purchase the mobile home



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homeowners insurance denied?

A. No.

Q. Do you currently live at your home at

37 West Shaw Mill Road full-time?

A. Yes.

Q. Do you have any vacation homes?

A. No.

Q. What is the Hope Mills house for?

A. That -- my husband had that house before we got married.

Q. Did you say earlier that y'all are trying to sell it right now?

A. Yes.

Q. Have you lived anywhere other than 37

West Shaw Mill Road for more than a month since

2010?

A. No.

Q. How long has your husband lived with you at the 37 West Shaw Mill Road house?

A. Ten, 11 years.

Q. How long has your nephew lived there with you?

A. Maybe about three -- three or four years.

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A. No.

Q. Do you currently live at 21 West Shaw  
Mill Road?

A. No.

Q. Do you rent it out to tenants?

A. Yes.

Q. Has there ever been a time where you  
have lived at 21 West Shaw Mill Road?

A. No.

Q. Have you had tenants at 21 West Shaw  
Mill Road for the entire time that you've owned  
it?

A. There were breaks in there. And then  
when I -- before I owned it I had to fix some  
stuff in it before I could put tenants in it.

Q. Since you started renting it out after  
you made the fixes to it, has there ever been a  
period of more than three months where you didn't  
have a tenant?

A. If -- I don't think it's been more than  
three months, but I have had gaps in there.

Q. When was the last time that you had one  
of those gaps?

A. Before my tenant that's there now. The

1                   BRANCH

2                   THE VIDEOGRAPHER: This is the end of  
3   Disc Media Number 1. The time is 10:34.

4                   (Whereupon, there was a recess in the  
5   proceedings from 10:34 a.m. to 10:38 a.m.)

6                   THE VIDEOGRAPHER: This begins Media  
7   Number 2 in the deposition of Sandra Branch. The  
8   time is 10:38.

9   BY MS. GIESER:

10          Q. Ms. Branch, you testified a little  
11   earlier that at 37 West Shaw Mill Road where you  
12   live, you're on municipal water, but you still  
13   use bottled water; is that correct?

14          A. I do.

15          Q. Why is it that you use -- use bottled  
16   water while hooked up to municipal water?

17          A. Because sometimes the water would have,  
18   like, little -- black little specks in it and  
19   then other times it would be cloudy looking so  
20   I -- I don't drink it.

21          Q. Has 37 West Shaw Mill Road ever been on  
22   well water while you have lived there?

23          A. Yes.

24          Q. When 37 West Shaw Mill Road was on well  
25   water, did you drink the well water?

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A. Yes.

Q. Did you switch to drinking bottled water before or after 37 West Shaw Mill Road got connected to municipal water?

A. After.

Q. Now I'm going to ask you a series of questions about your usage of water at 37 West Shaw Mill Road today, and then I will ask that same set of questions for before 2017.

Sit- -- starting with today, do you use water in your home for drinking?

A. Bottled water.

Q. Do you ever use tap water for drinking in your home?

A. I do not, no.

Q. Do you use water in your home for cooking?

A. Yes.

Q. For that do you use bottled water or tap water?

A. Tap water.

Q. Do you use water in your home for bathing?

A. Yes.